

Exhibit F

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— PLLC —

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Via Electronic Mail

September 16, 2024

Michael J. Turner
Federal Trade Commission
400 7th Street, SW
Washington, D.C. 20024
mturner@ftc.gov

Re: Rule 45 Subpoena to Atticus, LLC in *Federal Trade Commission v. Syngenta Crop Protection AG*, No. 1:22-CV-00828 (M.D.N.C.)

Dear Michael:

We write on behalf of Atticus, LLC in response to the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (“Subpoena”), served on Atticus by Plaintiff Federal Trade Commission (“FTC”).

Atticus appreciates the FTC’s consideration of the burden imposed on Atticus by the FTC’s overly broad subpoena. Atticus is working diligently, within the confines of what is permitted by its business obligations, to search for, collect, review, and produce responsive documents, subject to Atticus’s objections. Moreover, Atticus further appreciates the FTC’s understanding given various personnel schedules during the summer months.

Additionally, as you likely know, the two sets of defendants—Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC (collectively “Syngenta”) and Corteva, Inc. (“Corteva”)—each served subpoenas seeking extensive document production. Atticus has had to extend significant effort in reviewing those two subpoenas, which like the FTC’s subpoena contain numerous overly broad requests for production.

In view of the three separate Rule 45 subpoenas, Atticus is working to efficiently respond to the subpoenas in a manner that will avoid duplication. Furthermore, responding to three separate subpoenas totaling eighty document requests is extraordinarily burdensome for a third party such as Atticus.

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We also understand that, under the current scheduling order, the deadline to complete fact discovery is April 22, 2025, while the deadline for the parties to substantially complete document production is January 22, 2025. Atticus expects to complete its productions long before those deadlines.

Atticus's current production to the FTC can be accessed using the link to the Microsoft shared folder sent in the email accompanying this letter. The password to access the link will be sent under separate cover.

In this production are documents labeled with the Bates numbers ATTICUSFTC020329–ATTICUSFTC020337. The Bates numbering follows the Bates numbering for documents produced in response to the FTC's earlier Civil Investigative Demand.

These documents are produced in their native format with corresponding slip sheets. These native files are in Microsoft Excel format. The files are designated as HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY in accordance with the Protective Order. See ECF 202 ¶ 7.

If you have any issues downloading these files, please let us know.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt J. Dowd".

Matthew J. Dowd

*Counsel for Third-Party
Atticus, LLC*